

## Sablad, Elizabeth

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**From:** Lum, Darryl C <darryl.lum@doh.hawaii.gov>  
**Sent:** Thursday, January 09, 2014 10:32 AM  
**To:** Sablad, Elizabeth  
**Cc:** Smith, DavidW  
**Subject:** RE: Revised agenda for HI NPDES EOY session

Thanks Elizabeth! We will definitely focus on issuing those carry over permits before Sept. 2014. Kailua WWTP is going to be issued tomorrow (1/10/14) or next week Monday or Tuesday.

There is 1 hurdle. We recently completed the data exchange project. CWB's database (WPC system) is now connected to ICIS. Every night a batch process is run and the permit data flows from the WPC system to ICIS. The problem is the limit set coding, which was once done by Enforcement, has to now be done by the Engineering Section. (There are restrictions in our database and permission levels.) There is going to be a big learning curve. Also, this is going to be additional work the Engineering Section has to do. This shouldn't delay the issuance of the carry over permits. But, there is going to be a delay in the information going into ICIS.

Reef and I will attend the Enforcement Section.

Thanks,  
Darryl

Darryl Lum  
Clean Water Branch  
State of Hawaii Department of Health  
Phone: (808) 586-4309  
Fax: (808) 586-4352

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**From:** Sablad, Elizabeth [<mailto:Sablad.Elizabeth@epa.gov>]  
**Sent:** Thursday, January 09, 2014 6:39 AM  
**To:** Lum, Darryl C  
**Cc:** Smith, DavidW  
**Subject:** Revised agenda for HI NPDES EOY session

Hi Darryl,  
I revised the agenda to include a list of the permits carried over from FY13 (attached). We will be encouraging you to focus on issuing those permits no later than the end of FY14 (September 30, 2014). I think that's entirely possible, but let me know if there are hurdles of which I am not aware.

Also, I wanted to make sure you are aware that the enforcement session on Thursday (I think 8am HST) will be discussing permitting issues, so I hope you can make it to that session as well.

Sincerely,  
Elizabeth

Elizabeth Sablad  
NPDES Permits Office  
U.S. EPA Region 9

75 Hawthorne St. (WTR-5)  
San Francisco, CA 94105  
(415) 972-3044  
[sablad.elizabeth@epa.gov](mailto:sablad.elizabeth@epa.gov)

## Sablad, Elizabeth

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**Sent:** Thursday, January 09, 2014 8:39 AM  
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**Cc:** Smith, DavidW  
**Subject:** Revised agenda for HI NPDES EOY session  
**Attachments:** Jan 2014 Agenda for HI NPDES EOY.doc

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**From:** Sablad, Elizabeth  
**Sent:** Tuesday, May 07, 2013 8:55 AM  
**To:** [alec.wong@doh.hawaii.gov](mailto:alec.wong@doh.hawaii.gov); Lum, Darryl C; Smith, DavidW  
**Cc:** Woo, Nancy; Yin, Christina  
**Subject:** HI Permits Session detailed agenda for tomorrow  
**Attachments:** May 2013 HI NPDES Permits Session Agenda.doc

Hi Alec, Darryl,

Attached is a detailed agenda for our discussion tomorrow at 11am HST/ 2pm PST. It is long, so we may have to postpone discussion of some of the technical items to another meeting. Please let me know what phone number to reach you. Otherwise, I will just call the main line. Also, please let me know if you have any questions or concerns about the agenda. Talk to you tomorrow.

Sincerely,  
Elizabeth

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**Sent:** Monday, May 06, 2013 12:13 PM  
**To:** Lum, Darryl C  
**Cc:** [alec.wong@doh.hawaii.gov](mailto:alec.wong@doh.hawaii.gov); Smith, DavidW  
**Subject:** RE: HI NPDES May Grant Negotiations Call

Yes, I already have contractor support on the agenda and we can decide which permits later. I just wanted to understand how many permits you were requesting support for.

-Elizabeth

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Hi Elizabeth,

We didn't decide on the other 3 contractor support permits yet. Could this be added as a discussion topic?

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**Cc:** Wong, Alec Y; Smith, DavidW  
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I will make sure these items are on the agenda.

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**Sent:** Thursday, May 02, 2013 11:18 AM  
**To:** 'Lum, Darryl C'  
**Cc:** Smith, DavidW; [alec.wong@doh.hawaii.gov](mailto:alec.wong@doh.hawaii.gov)  
**Subject:** RE: HI NPDES May Grant Negotiations Call

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Please let us know if you want to add any agenda items and what number we can reach you at.

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On 5/8/13, we are giving a presentation/workshop at 8 am. We should be back by 11 am.

We are not available on Thursday (5/9/13).

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**To:** Lum, Darryl C; Wong, Alec Y  
**Cc:** Smith, DavidW  
**Subject:** HI NPDES May Grant Negotiations Call

Hi Alec and Darryl,  
Please let me know if you are available to have our May Grant Negotiations Call for the NPDES program either Wednesday at 8:30am HST/11:30am PST or 10:30 HST/1:30 PST, or Thursday at 11am HST/2pm PST. Also, if you have additional topics for the agenda (below), please send them to the group. I think we can do this in an hour, but let me know if you think additional time is necessary. Thanks!

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Elizabeth Sablad  
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U.S. EPA Region 9  
75 Hawthorne St. (WTR-5)

San Francisco, CA 94105  
(415) 972-3044  
[sablad.elizabeth@epa.gov](mailto:sablad.elizabeth@epa.gov)

## Sablad, Elizabeth

---

**From:** Lum, Darryl C <darryl.lum@doh.hawaii.gov>  
**Sent:** Monday, May 06, 2013 10:58 AM  
**To:** Sablad, Elizabeth  
**Cc:** Smith, DavidW; [alec.wong@doh.hawaii.gov](mailto:alec.wong@doh.hawaii.gov)  
**Subject:** RE: HI NPDES May Grant Negotiations Call  
**Attachments:** 2014 schedule.pdf

Hi Elizabeth,

1. Please see attached for the 2014 schedule. The 2 highlighted permits (East Honolulu WWTP and Kahului Generating Station) are contractor assistance.
2. Nutrient/ZOM Issue Summary: DOH believes that it is not appropriate to establish end of pipe limits (WQS x dilution factor) for pollutants that have assimilative capacity. 40 CFR 122.44(d) requires limits for all pollutants with a reasonable potential to exceed WQS. However, it does not state that the limits need to be WQS x dilution factor and/or end of pipe. DOH believes that a performance based end of pipe limit is more appropriate if there is assimilative capacity.
3. DOH also believes that when there is insufficient information (e.g. applicant does not have a dilution factor that represents conditions at the edge of the ZOM), end of pipe limits should not be set in the permit. Conditions should be placed in the permit to require additional dilution studies/monitoring. This additional information can be utilized during the next permit to set end of pipe limits. DOH would also like to discuss the possibility of placing a re-opener clause in the permit when the new dilution study/monitoring is completed.
4. We would like to discuss TIE/TRE.
5. We would like to discuss Intake credit approval.

Thanks,  
Darryl

Darryl Lum  
Clean Water Branch  
State of Hawaii Department of Health  
Phone: (808) 586-4309  
Fax: (808) 586-4352

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**Sent:** Monday, May 06, 2013 5:51 AM  
**To:** Lum, Darryl C  
**Cc:** Smith, DavidW; Wong, Alec Y  
**Subject:** RE: HI NPDES May Grant Negotiations Call

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**To:** Sablad, Elizabeth  
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## Sablad, Elizabeth

---

**From:** Wong, Alec Y <[alec.wong@doh.hawaii.gov](mailto:alec.wong@doh.hawaii.gov)>  
**Sent:** Monday, May 06, 2013 10:29 AM  
**To:** Smith, DavidW  
**Cc:** Sablad, Elizabeth; Roser, Sara; Lum, Darryl C  
**Subject:** RE: HI Permit Issues

Hi David,

Please provide DOH the procedures to appeal your decision.

Thanks!

Alec Wong  
Clean Water Branch  
State of Hawaii Department of Health  
Phone: (808) 586-4309  
Fax: (808) 586-4352

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**From:** Smith, DavidW [<mailto:Smith.DavidW@epa.gov>]  
**Sent:** Wednesday, May 01, 2013 12:48 PM  
**To:** Wong, Alec Y  
**Cc:** Sablad, Elizabeth; Roser, Sara  
**Subject:** HI Permit Issues

Hi Alec- Thanks for speaking with me today. We should absolutely put on our agenda for next week both the issues associated with developing permit limits for nutrients and the associated mixing zone analysis issues, as well as the EPA decision to withhold payment of \$15,000 in grant funds due to failure to meet permit completion commitments in the 106 workplan. Regarding the latter issue, we will be prepared to go over the timeline on these permits and compare it to workplan commitments. As we discussed, we have decided to withhold grant funds as follows:

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- \$5,000 for failure to issue Kailua WWTP permit on time and due to the extensive delays in releasing a PN draft permit.

Of course, we also look forward to discussing the status of other permits in process and coming up later this year as well.

Many thanks. Please let me know if you have questions.

David Smith  
Manager  
NPDES Permits Office (WTR-5)  
U.S. EPA Region 9  
75 Hawthorne Street  
San Francisco, CA 94602

(415) 972-3464 (office)  
(415) 972-947-3545 (fax)

## Sablad, Elizabeth

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**To:** Lum, Darryl C  
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